



United States Department of Justice

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July 26, 2022

Honorable Thomas J. McAvoy
Senior U.S. District Judge
Federal Building and U.S. Courthouse
15 Henry Street
Binghamton, New York 13901

Re: *United States v. Jacob Delaney*, 20-CR-00335 (TJM)

Dear Judge McAvoy,

This letter is respectfully submitted in response to the Court's Decision & Order dated July 19, 2022 (*see* Dkt. No. 129) which directed the government to provide to the court, and the defense, proposed redactions for any documents that remained redacted or sealed based on the aforementioned Decision & Order. Contemporaneous with the filing of this letter, the government is providing to the Court, and the defense, via e-mail proposed redactions (highlighted in pink) to the following documents:

- Dkt. No. 45 (Declaration of Defense Attorney Scott Iseman);
- Dkt. No. 46, Exhibit D (Agent Diggon's 11/18/2019 FD-1057);
- Dkt. No. 46, Exhibit E (Agent Fallon's 12/10/2019 search warrant application and supporting affidavit);
- Dkt. No. 46, Exhibit I (FD-302 of 12/18/2019 summarizing the 12/12/2019 interviews of the defendant);
- Dkt. No. 51-1 (Government Memorandum of Law in Opposition to Defendant's Motion to Suppress);
- Dkt. No. 65 (Decision and Order of 7/30/2021).¹

¹ Upon further review, the government does not object to the filing of Dkt. No. 44 (Defense Memorandum of Law in Support of Motion to Suppress) and Dkt. No. 55 (Defense Reply Brief) without any redactions.

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Thank you.

Sincerely,

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